UNITED STATES DISTRICT COURT

for the
Southern District of Indiana

Brooke Nicole Taflinger *Plaintiff*	)	
v.	)	Cause No. 1:09−cv−00771−TWP−DML
Brian Hindson, et al *Defendants*	)	

MOTION TO REOPEN DISCOVERY

1. Discovery was closed in this matter on June 1, 2010.
2. This case is one of several similar cases currently on file across the United States alleging that Defendant USA Swimming enabled and covered up a ring of child molesters for decades.
3. Through discovery in these other cases, which has been ongoing after the close of discovery in this case, Plaintiff in this case learned that USA Swimming has been withholding documents and information regarding foreseeability and liability directly relevant in the present case. *See* attached orders compelling discovery from the San Jose case.
4. Plaintiff requests that discovery be reopened for the limited purposes of Plaintiff obtaining these identical new documents which are helpful to prove Plaintiff's claim, have already been produced by USA Swimming, and would be beneficial to this Court to rule on the pending motions for summary judgment in this matter as they will help establish dispute material facts.

5. Specifically, Plaintiff would like to request those documents which were delivered the week of September 5, 2011 on Order from the Honorable Erica Yew of the Santa Clara County Superior Court to Plaintiff's counsel in the case of *Jane Doe, et al. v. USA Swimming, Inc., et al*, Santa Clara County Superior Court Case No. 109CV149813, as well as any other documents submitted *in camera* in that case. The burden of producing documents already produced in another case is slight, and the prejudice to Plaintiff's case could be immeasurable.
6. Plaintiff requests that discovery in this matter be reopened for the limited purpose set forth above not to exceed ninety (90) days so that substantial justice may be done on a complete, not selective, record.

Respectfully,

S/Jonathan Little
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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of October, 2011, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Jonathan C. Little *Attorney for Plaintiff*	jonlittlelaw@gmail.com
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Law Offices of James Curran *Attorney for Plaintiff*	
Thomas E. Wheeler, II FROST BROWN TODD, LLC *Attorney for Defendant Westfield Washington School Corporation*	twheeler@fbtlaw.com
Bernard L. Pylitt KATZ & KORIN, PC *Attorney for Defendant United States Swimming, Inc.*	bpylitt@katzkorin.com

I hereby certify that on the 19th day of October, 2011, a copy of the foregoing was mailed, by first class, United States mail, postage prepaid and properly addressed to the following:

Brian D. Hindson
FCI Marianna Correctional Institution
P.O. Box 7007
Marianna, FL 32447

/s/ Jonathan Little
Jonathan Little